

TX 1813

APR 10 1984

Mr. D.R. Spell, P.E.  
Head, Environmental Branch  
Department of the Navy  
Naval Facilities Engineering Command  
2144 Melbourne Street  
P.O. Box 10068  
Charleston, SC 29411

RE: NACIP Confirmation Study and Summary of Remedial Action, Naval  
Weapons Industrial Reserve Plant, McGregor, Texas, August 1983.

Dear Mr. Spell:

~~MC GREGOR NAVAL WEAPONS~~

~~TX 9170024708~~

We appreciate the opportunity to review the subject document. It will be added to our file material on potentially hazardous waste disposal sites at Federal facilities in Environmental Protection Agency Region VI.

We are in concurrence with the proposed remedial measures to be taken at the facility, with the following exceptions and modifications:

1. It is stated in the report that contamination of pesticides in Area G does not exist below 12 inches in depth. However, two samples collected at 24 inches and another at 42 inches showed concentrations of DDT of 1.9 and 3.9 ppm, respectively. The report likewise states that the pesticides of concern are insoluble and have a high affinity for the soil, thus making deeper contamination via leaching unlikely. This scenario would be true in most instances but the type of soil conditions at this site might prove otherwise. The soil on which the pesticides are disposed of is a vertisol and therefore undergoes considerable shrinking, swelling and in some instances cracking that may extend to shallow bedrock. The cracking mechanism may allow for surface material (pesticides in this instance) to slough off from the surface and migrate to greater depths within the soil profile possibly contaminating groundwater.
2. The report states the level of cleanup should be 1 ppm or less for the pesticides in the soils at Area G. To accomplish this criterion, the report recommended 12 inches of soil be excavated. As alluded to before, there are two samples taken at depths greater than 24 inches that exceed 1 ppm. Therefore, the criteria for cleanup cannot be met given the proposed level of response.

SUPERFUND FILE

9417699

JAN 12 1993



REORGANIZED

3. The remedial actions suggested for the asbestos dump are, a two foot covering with topsoil, rerouting surface drainage away from the piles, and placing signs at the perimeter. The covering on the asbestos pile should be a soil somewhat less clayey than those found at the site and it should be sloped in such a manner as to maximize runoff while minimizing erosion processes
4. The report recommends that the less DDT- contaminated soil from Area G be disposed of in a nearby trench. It is our opinion that this soil should be disposed of in accordance with RCRA regulations.

Finally, we are in concurrence with the recommendation made in the May 13, 1983 letter from the Texas Department of Water Resources referenced in the report, that a groundwater monitoring program should be initiated. Deep and shallow monitoring wells should be placed in Area G to assess vertical and horizontal migration. Furthermore, it would be beneficial if we could receive a copy of the "Ground Water Quality Assessment, Area P," report prepared by Shannon & Wilson (Contract NS2467-B1-C-0992), listed as a reference for this report.

In accordance with Executive Order 12088, please advise us of what activities are conducted to address our concerns and the recommendations in your report.

Respectfully,

Samuel L. Hott, Chief  
Superfund Branch

cc: Kathleen Anglin, Hercules Inc.

bcc: Jim Highland, 6ES-FF  
TX 1813

6AW-SE:GARDNER:X4075:jmh:030784:Disk 1/19

6AW-SE:GARDNER:X4075:jmh:030784:Disk 1/19

		CONCURRENCES					
SYMBOL	6AW-SE	6AW-SO					
SURNAME	WRIGHT	HITT					
DATE	4/20/84	7/26/84					

3/9/84